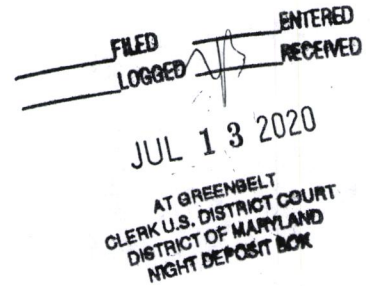


IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

TIBEBE F. SAMUEL
6832 New Hampshire Avenue
Takoma Park, MD 20912



Plaintiff

v.

Civil Action No.

Oromia Media Network (OMN)
1144 Larpenteur Avenue West
St. Paul, MN 55113

1PX 20CV2029

And

Principal Officer: Taddele M. Kitaba (In His OMN Official capacity)
6900 Winnetka Circle #B
Brooklyn Park, MN 55428

And

Ayantu Bekecho, in her personal capacity
2480 Highway 100 S. #201
Minneapolis, MN 55416

Defendants

COMPLAINT AND REQUEST FOR INJUNCTION

I. The Parties to This Complaint:

A. The Plaintiff

TIBEBE F. SAMUEL
6832 New Hampshire Avenue
Takoma Park, MD 20912
Tel. 240-425-2145
Email: tibebe fsamuel@gmail.com

B. The Defendant(s)

Defendant No. 1

Oromia Media Network (OMN)
1144 Larpenteur Avenue West
St. Paul, MN 55113

Defendant No. 2

Principal Officer: Taddele M. Kitaba
6900 Winnetka Circle #B
Brooklyn Park, MN 55428

Defendant No.3

Ayantu Bekecho, in her personal capacity
2480 Highway 100 S. #201
Minneapolis, MN 55416

II. Basis for Jurisdiction

1. This Honorable court has jurisdiction in this matter pursuant to 28 U.S.C. § 1331 and 28 U.S.C. § 1332. This case involves a violation of the United States Statutes, IRS' regulation, and also involves citizens of different states that involve damages for more than \$75,000. The defendants in this case have violated 18 U.S. Code § 956, 18 U.S. Code § 878, and 26 USC Code § 501 (c). The actions of the defendants have caused the

plaintiff financial loss and enormous mental pain and anguish, and they have continue to damage the plaintiff.

A. The basis for Jurisdiction Is a Federal Question

i. The defendants used an organization that is established pursuant to I.R.C 501(c) and used it for their own malicious political propaganda that caused the death of hundreds of ethnic minority in Oromia region Ethiopia, the destruction of business and individuals that are worth in millions, and the burning of multiple Orthodox Christian Church's. Moreover, in violation of 18 U.S. Code § 878, they have engaged and encouraged, solicited, and incited threats and extortion against foreign officials, official guests, or internationally protected persons; they have facilitated the advocacy of the assassination of a foreign leader, the genocide of non-Oromo ethnic groups living in the Oromia region in Ethiopia causing the death of more than 200 people in June 2020 alone (the counting of the dead has still continued and it is feared it is more), the injury of thousands innocent citizens of Ethiopia and the destruction of property that is worse millions of dollars. The defendants are using their media platform and various social media outlets to recruit extremist Oromos in Ethiopia and encourage destruction to destabilize the country. As a result, the Ethiopian government has closed the internet to prevent the defendants from disseminating their hateful propaganda.

Plaintiff in this case, owns and operates an import business in Ethiopia and his business is damaged as a result of the defendants' direct action. Moreover the plaintiff is unable to learn the fate of his brothers, nieces, and relatives who live in Addis Ababa, Ethiopia, one of his brother is a permanent resident of the United States, because the government has shut down the internet and other communication outlets to prevent the defendants from disseminating their dangerous message that calls for genocide in the Oromia region. The defendants' use of the media they own and the social media to encourage extremist Oromos mob to take brutal action against innocent civilians.

ii. The defendants have violated 18 U.S. Code § 956. Conspiracy to kill, kidnap, maim, or injure persons or damage property in a foreign country. The defendants, who are based in the United States, are using an organization that is supposed to be educational and a non-partisan organized pursuant to the I.R.C. § 501(c) to call for genocide, to maim kill, kidnap and injure persons and damage property in Ethiopia. The defendants' anti-ethnic-Amharas propaganda has caused the death of more than 86 innocent citizens in Ethiopia in October 2019, and so far, more than 200 innocent individuals since June 30, 2020. The number of deaths is expected to climb. As a result of the transmission of the hateful program by the defendants, properties worth in millions is destroyed. Ninety percent of the town called Shahmene is completely destroyed. Heads are severed, homes are burned, individuals are hanged from the tree, women, men, elderly, and children are killed. What is urgent and dangerous is, the defendants have raised more than \$200,000.00 in Gofundme and other outlets to instigate "revolution" in Ethiopia. Their revolution is calling for purification of the area that they call Oromia.

iii. Violation of I.R.C. 501(c), the defendants established the OMN, with false pretenses. Although the organizers filed their paperwork with the IRS claiming that the OMN would be a non-partisan educational broadcasting organization that provides citizen-based journalism, its true purpose is to incite violence in Ethiopia and promote the interest of extremist Oromos. The former OMN executive director, Jawar Mohamed told the media in 2013, "We have now liberated the airwaves of Oromia. We will liberate the land [in] the coming years". The defendant the intention has been all along to commit genocide against the Amharas in the guise of "liberating Oromia" and they are using America's taxpayers' money to incite violence in Ethiopia which caused this plaintiff financial loss and enormous emotional pain.

B. The basis for Jurisdiction Is Diversity of Citizenship

1. Plaintiff Tibebe Samuel is a citizen of the State of Maryland and a national of Ethiopia;

2. The Defendants:

a. Defendant Oromia Media Network is a nonprofit organization, incorporated in the State of Minnesota and has its principal office in the state of Minnesota.

b. Defendant Taddele M. Kitaba is the head of the OMN, he is a citizen of the State of Minnesota.

c. Defendant Ayantu Bekecho, a member of OMN, and a citizen of Minnesota.

3. The Amount in Controversy– the amount the plaintiff claims the amount at stake—is more than \$75,000, not counting interest and costs of court, because (a) the defendants in their irresponsible and reckless actions have caused the plaintiff's business in Ethiopia to suffer. The closure of the plaintiff business is a direct result of the defendants' encouragement of violence in Ethiopia. Business were shut down in Addis Ababa where plaintiff's import-export business is located. Moreover, the plaintiff is subjected to enormous mental anguish and distress fearing for the safety of his family members and other citizens in Ethiopia. Plaintiff has been a human rights advocate since he was 13 years old and has been living in exile in the United States since August 1982 and remains a citizen of Ethiopia.

(b) Plaintiff is ethnic Oromo on his father side, the defendants are using the Oromo people to promote the defendants' extremist agenda; as a result of the defendants' encouragement of inhuman and brutal act, the Oromos are considered brutal by many Ethiopians and friends of Ethiopia. The defendants operate under the color of nonprofit and nonpartisan organization in the name of the Oromo people, but they are advocating violence and inciting genocide to destabilize Ethiopia. As a

result, the plaintiff has spent many sleepless nights, he is subjected to enormous mental anguish and pain.

III. Statement of Claim

1. The defendants are based in Minnesota; they function as a non-profit broadcasting the organization supported by the US taxpayers. According to their article of organization, they are supposed to be “an independent and nonpartisan news enterprise whose mission is to produce original and citizen-driven reporting on Oromia.”
2. The defendants have been disseminating one-sided political indoctrination and hateful messages against the ethnic minority who live in the Oromia region, in Ethiopia. As a result of the defendants “fake news” and dangerous hateful programs, in addition, usage of their social media platform, to disseminate hateful and dangerous messages, they have caused the death of women, men, children and the elderly, the destruction of many properties, and the burning of churches.
3. In October 2019, the defendants’ former leader named Mr. Jawar Mohammed, who is in Addis Ababa, Ethiopia, who is also a naturalized US citizen, falsely claimed that he was surrounded by the Ethiopian police. At that time, the Ethiopian government itself was providing protection to Mr. Mohamed. The defendants used the OMN to falsely claim that there was an assassination attempt against Mr. Mohammed and called upon their supporters to defend Mr. Mohammed. As a result of the dangerous, hateful, and false information, more than 86 innocent Ethiopian lost their lives, properties worth in millions was damaged, multiple churches were burned, and many people were injured. The Ethiopian government was held hostage because it feared the incitement of more violence and destruction by the defendants if it took any action against Mr. Mohamed for falsely causing deaths and destruction of properties.

4. As a result of the incitement of violence, the government shut down the internet, and many businesses, including plaintiff's business, shut down for days, which resulted in the loss of revenue to the plaintiff. Moreover, the brutality and the recklessness of the defendants and their supporters' action caused the plaintiff enormous mental anguish and pain.

5. The defendants, since April 2020, have been agitating their supporters for disorderly conduct as a result of the extension of the Ethiopian election because of COVID19. Although most of the defendant one board members are US citizens, they used their platform to interfere in the Ethiopian election hoping that Mr. Jawar Mohammed will take power in Ethiopia using his violent supporters. Although Mr. Jawar is a US citizen, and he is not eligible to run for office in Ethiopia, the defendants used OMN to raise funds under the guise of "Jawar 2020). Unfortunately, the fund is used to support the luxurious life of Mr. Mohammed and to corrupt some officials in Ethiopia. Since May 2020, the defendants have been telling the military and the law enforcement apparatus in Ethiopia not to accept any order from the Ethiopian government after October 10, 2020. Their intention was to bring the extremist Oromos to power using violence.

6. In or about the beginning of June 2020, the defendants conducted an interview with a well-known singer named Huchallu Hundessa; Huchallu is a well-known supporter of the reform-minded Prime Minister of Ethiopia who won the Nobel Peace Prize in 2019. The defendants asked Mr. Hundessa provocative and hate provoking questions and his answer became very controversial. Mr. Hundessa, was well respected and loved by many Ethiopians. After realizing the danger that his interview my cause in the country, pleaded with the defendants not to broadcast the interview, knowing the controversy, and the possibility of incitement of violence because of the interview, the defendants broadcasted the interview.

7. As it is feared, the reaction created ethnic conflict; a few weeks later, Mr. Hundessa was gun down in the middle of Addis Ababa. Related to the assassination

of Mr. Hundessa and following the attempt by the defendants and Mr. Mohammed to use the funeral for their malicious political purpose, and the hateful and violence-inciting broadcast by the defendants, the Ethiopian government arrested OMN's journalists in Addis Ababa. In addition, Mr. Jawar Mohammed and some of his followers were arrested because their reckless actions caused the destruction of property, false imprisonment of officials, and death of a police officer when they prevented the body of Mr. Hundessa traveling to his birthplace and returned it by force to Addis Ababa. The OMN false coverage of the incident with the intention of inciting violence.

8. Since the assassination of Mr. Hundessa on or about June 29, 2020, these defendants broadcasted hateful messages against ethnic Amharas knowing the reaction of their supporters in the Oromia region would be brutal violence. The massacre of Amharas and other ethnic groups began in the Oromia region because the defendants accused the Amharas of killing Huchallu Hundessa whom they call Neftengas, a derogatory term for ethnic Amhars. Many people were killed brutally with machetes, bodies of innocent citizens were dragged on the streets; the death toll is yet to be known, so far more than 200 people are counted. The property destruction and the injury caused by the action of these defendants is yet to be realized.

9. Since the death of Huchallu Hundessa, as a result of the defendants' false assertion many extremist ethnic Oromos who live in Minnesota, other US cities, Canada, and Europe held protests accusing the Amharas and the government whom they claim is conspiring with the Amharas against ethnic Oromos. They falsely accused the government of assassinating Huchallu when in fact that they are aware Huchallu supported the current government and opposed Mr. Jawar Mohammed's destructive politics. It is worth noting that the Ethiopian government is currently controlled and led by Oromos. The Prime Minister, Defense Minister, the Attorney General and most of the cabinet members are Oromos.

10. Since the assassination of Huchallu, the defendants are calling for more blood shade in Ethiopia. They are using various social media platforms and broadcasting statements that call for the assassination of Ethiopia's Prime Minister, and high profile personalities in Ethiopia. The attached exhibits show that the defendants are broadcasting statements that call for burning of houses of ethnic Amharas, and also, it shows the fundraising effort to destabilize Ethiopia by inciting "revolution".

11. As a result of such brutal actions, the government has shut down the internet to prevent the defendants' message from coming through to Ethiopia. As a result Plaintiff's business in Ethiopia is disrupted, he leaves in fear and enormous anxiety because he does not know the fate of his family members who are in Ethiopia and he is living under enormous mental anguish and pain because of the brutal killing of innocent people and knowing the death and destruction is caused in the name of the Oromo people.

12. The action of the defendants has caused the plaintiff enormous pain; he feels great shame as an Oromo; he is extremely worried about the future of his country; he could not eat, sleep, and conduct his daily life because of the mental anguish he suffering caused by the defendants conduct. As a US taxpayer, the plaintiff feels that he is contributing to the mayhem caused in Ethiopia by these defendants. He has also suffered financial loss because of the defendants' direct action.

IV. Irreparable Injury

A. The defendants have caused irreparable injury to the plaintiff and they are preparing to cause more harm unless they are stopped. This is a Rwandan type of genocide waiting to happen. The injury caused by the defendants supported by the US taxpayers is enormous. Unless they are stopped, the massacre will continue because they are calling for genocide. No amount of money can compensate the plaintiff. The enormous damage caused by the defendants cannot be quantified. How one can sleep knowing that 81-year-old man was beaten to death in his own home, knowing women and children were killed because of their

ethnicity. The extremists who are incited by the defendants' hateful propaganda severed innocent individuals heads and hanged the hade on a tree; these extremists dragged their victims' bodies on the street. These images are hunting the plaintiff; such brutal act was done in the name of the Oromos, the ethnic group that the defendant is part of. What monetary reward could remedy such brutality?

V. Relief

1. Plaintiff respectfully ask the court to award him monetary damage for the loss of his business and the mental anguish he suffered and will continue to suffer in the amount of \$350,000.00.
2. Plaintiff request this Honorable court to cease the asset of the defendants, including the money raised through Gofundme and other media outlets, and put it in escrow account, assign a trusty, and compensate some of the victims who are injured as a result of the actions of the defendants.
3. That the Honorable Court order the IRS to do a proper audit of OMN and revoke the tax-exempt status of defendant one.
4. That the Honorable Court order The state of Minnesota revoke defendant one's article of incorporation/organization.
5. If possible, that the court direct the US Attorney General Office in Minnesota to look into the allegations made by the plaintiff and take appropriate action.
6. And for all other remedies and relief that this court may believe just and proper.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a non-frivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

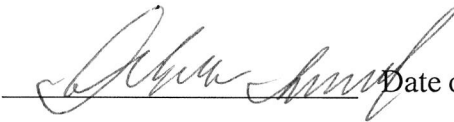
Respectfully Submitted,

Tibebe Samuel, Plaintiff:

6832 New Hampshire Avenue

Takoma Park, MD 20912

240-425-2145

 Date of signing: 7/13/2020